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UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

YONG JIANG,

Defendant.

No. 2:24-CR-00187-JLS

GOVERNMENT'S SENTENCING POSITION
REGARDING DEFENDANT YONG JIANG

Sentencing Date: 2/7/2025
Sentencing Time: 10:00 AM
Location: Courtroom of the
Hon. Josephine L.
Staton

Plaintiff United States of America, by and through its counsel of record, the Acting United States Attorney for the Central District of California and Assistant United States Attorney James C. Hughes, hereby files its sentencing recommendation regarding defendant Yong Jiang. The Probation Office has recommended that defendant be sentenced to a two-year term of probation based on a Guideline offense level computation of level 12. While the government agrees with the Probation Office's offense level computation, for the reasons set forth herein, the government believes that defendant's

1 offense warrants a term of incarceration. However, as defendant has
2 already spent eight months in custody prior to his release on bond on
3 November 15, 2024, the government would recommend that the Court
4 impose a sentence of eight months incarceration with time-served,
5 with a two-year period of supervised release to follow. As explained
6 below, the government believes that this sentence will provide just
7 punishment for the offense of conviction while taking account of
8 defendant's personal and familial circumstances.

9 **I. Offense Conduct**

10 During the period at issue in this case, defendant was the CEO
11 of Quickfish Supply Chain, Ltd, a logistics business in Shenzhen
12 City, China. (PSR ¶¶ 12, 72). Defendant's business provided shipping
13 services to e-commerce businesses in the People's Republic of China,
14 who would contract with defendant to ship and deliver packages from
15 China to their customers in the United States. (Id. at ¶ 12).
16 Beginning as early as May 1, 2023 and continuing through at least May
17 24, 2023, defendant conspired with Lijuan Chen ("Chen") and Chuanhua
18 Hu ("Hu"), to defraud the United States Postal Service through the
19 use of false and counterfeit PC postage shipping labels. (CR. 32 ¶¶
20 31-34). During this period, defendant purchased large volumes of the
21 counterfeit PC Postage shipping labels from Hu and Chen and used this
22 counterfeit postage to ship packages on behalf of his business
23 throughout the country. (Id.) To avoid detection of his fraud,
24 defendant purchased different types of counterfeit postage based on
25 the belief that certain types of counterfeit postage (i.e.
26 underweighted postage vs. wholly fabricated postage) were harder to
27 detect than others. (Id. at ¶ 37). Defendant's use of counterfeit
28

1 postage caused losses to the United States of between \$40,000 and
2 \$95,000. (Id. at ¶ 40).

3 **II. Advisory Sentencing Guidelines**

4 The Probation Office calculates defendant's Guideline offense
5 level at a level twelve, based on an adjusted offense level seventeen
6 under USSG § 2X1.1(a) and 2B5.1, a three-level adjustment for
7 acceptance of responsibility under USSG § 3E1.1(b), and a two level
8 zero-point offender adjustment under USSG § 4C1.1. (PSR ¶¶ 26-44).
9 The government agrees with the Probation Office's computation and
10 believes no additional adjustments are appropriate in the present
11 circumstance.

12 **III. Restitution**

13 The Probation Office recommends that defendant pay restitution
14 to the United States Postal Service of \$95,000. (Id. at ¶¶ 98-99).
15 The government agrees with the Probation Office's computation.

16 **IV. Government's Sentencing Recommendation**

17 In this case, defendant willfully conspired with others to
18 defraud the Postal Service through the use of false and counterfeit
19 postage, causing the government significant financial losses.
20 Defendant undertook this conduct with deliberation and structured his
21 purchases of counterfeit postage in a manner designed to maximize the
22 chances that his fraud would not be uncovered by the Postal Service.
23 Given the brazen nature of defendant's fraud, the government
24 recommends that defendant be sentenced to a period of eight-months
25 incarceration with credit for time-served, with a two-year period of
26 supervised release to follow under the same terms outlined in the
27 Probation Office's sentencing recommendation letter. The
28 abovementioned sentence balances the severity of the underlying

1 offense and the need to deter defendant and others from future
2 conduct with defendant's personal circumstances.

3 **V. CONCLUSION**

4 For all the foregoing reasons, the government respectfully
5 submits that the factors set forth in 18 U.S.C. § 3553(a) support
6 imposition of a sentence that includes an eight-month term of
7 incarceration with credit for the time already served by defendant
8 during pre-trial detention, a two-year term of supervised release,
9 payment of a \$100 special assessment, and payment of restitution in
10 the amount of \$95,000.

11 Dated: January 31, 2025

Respectfully submitted,

12 JOSEPH T. MCNALLY
13 Acting United States Attorney

14 LINDSEY GREER DOTSON
15 Assistant United States Attorney
Chief, Criminal Division

16 /s/
17 JAMES C. HUGHES
Assistant United States Attorney

18 Attorneys for Plaintiff
19 UNITED STATES OF AMERICA
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